

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF WISCONSIN

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JUSTIN BLAKE,

Plaintiff,

v.

Case No. 22-CV-970

DAVID BETH in his individual capacity and official  
capacity,  
COUNTY OF KENOSHA a municipal corporation,  
KYLE BISSONNETTE in his official capacity,  
JACOB DiCELLO in his official capacity,  
GLORIA GALVAN in her official capacity,  
DEREEMEYUN HAYNES in his official capacity  
JEREMY MAY in his official capacity,  
JESSICA BERGMANN in her individual and official capacity,  
VISITING NURSE CARE, INC.,  
KENOSHA VISITING NURSE ASSOCIATION,  
JOHN DOE OFFICERS in the Kenosha County  
Sheriff's Department 1-10,  
JANE DOE MEDICAL PROFESSIONALS in their  
individual and official capacities  
WISCONSIN MUNICIPAL MUTUAL INSURANCE  
COMPANY,  
ABC INSURANCE COMPANY, and  
XYZ INSURANCE COMPANY,

Defendants.

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**DEFENDANTS DAVID BETH, COUNTY OF KENOSHA, KYLE BISSONNETTE,  
JACOB DICELLO, GLORIA GALVAN, DEREEMEYUN HAYNES, JEREMY MAY,  
AND WISCONSIN MUNICIPAL MUTUAL INSURANCE COMPANY'S MOTION  
SUMMARY JUDGMENT**

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Defendants David Beth, County of Kenosha, Kyle Bissonnette, Jacob DiCello, Gloria Galvan, Dereemeyun Haynes, Jeremy May, and Wisconsin Municipal Mutual Insurance Company ("County Defendants"), by their attorneys Crivello Nichols & Hall, S.C., hereby move the Court, the Honorable Pamela Pepper, presiding, for an Order granting summary judgment in their favor on all claims.

This Motion is made pursuant to Fed. R. Civ. P. 56 and is brought upon the ground that the Plaintiff cannot substantiate his claims as a matter of law. This Motion is made upon the pleadings and proceedings herein, the Brief in Support of Summary Judgment, the County Defendant's Proposed Findings of Fact, the Declarations of Brianna J. Meyer, Steven C. McGaver, Kyle Bissonnette, Jacob DiCello, Dereemeyun Haynes, Gloria Galvan and Jeremy May, as well as all other papers, pleadings and exhibits on file herein. Through this Motion, the County Defendants seek dismissal of all claims, plus an award of costs, disbursements and fees as may be allowed by law.

Dated this 20th day of January, 2025.

By: /s/ Brianna J. Meyer  
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DiCello, Gloria Galvan, Dereemeyun Haynes,  
Jeremy May, and Wisconsin Municipal Mutual  
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